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THE UNITED STATES

DISTRICT COURTS FOR THE

SOUTHERN AND EASTERN DISTRICTS OF

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(1923-2002)

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January 15, 2025

Re: Civil Action No.: 1-24- cv-06845 FB-TM

Honorable Fredric Block, U.S.D.J.

Honorable Taryn Merkl, U.S.M.J.

United States District Court for the New York Eastern District

225 Cadman Plaza East

Brooklyn, NY 11201

Dear Judges Block and Merkl:

Over the past few days there has been a significant development in the above matter. I write with the consent of all counsel of record to inform you.

There has been an informal mediation. That mediation has made significant progress in resolving this matter to the extent that letters of intent memorializing a settlement in principle have been executed subject to the drafting of long form agreements. The letters of intent give a 90-day window to have long form agreements drafted and executed. The settlement in principle involves a series of boxing events which is why the 90-day time frame was set though the parties will attempt to consummate the long form agreements earlier.

Consent Order We are therefore submitting a proposed Consent Order staying the proceedings for 90 days with joint reports to be submitted to the Court at 30-day intervals as to the progress in finalizing settlement.

If the Consent Order meets with your approval the parties respectfully request that it be executed and filed.

Respectfully submitted,

  
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Patrick C. English, Esq.